

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FLORENCE ROSTAMI LAW LLC,

Case No. 2:24-cv-11123

Plaintiff,

v.

Honorable Brandy R. McMillion
Mag. Judge Anthony P. Patti

MITSUIYA INDUSTRIES, CO.
LTD.

Defendant.

STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT

The undersigned counsel of record for Plaintiff Florence Rostami Law LLC (“Plaintiff”) and Defendant Mitsuiya Industries, Co. Ltd. (“Defendants”) stipulate and agree to extend the time for Defendant to respond to Plaintiff’s Complaint as follows:

WHEREAS Plaintiff and Defendant agree that the time for Defendant to respond to the Complaint shall be extended up to and including October 14, 2024;

WHEREAS the requested extension is intended by the parties to afford Defendant’s recently retained counsel time to review and investigate this matter and the allegations in Plaintiff’s Complaint;

WHEREAS, per the information Florence Rostami received from Japan Ministry of Foreign Affairs, even though the complaint and summons [DOC. Nos. 1

and 2] were served on Defendant on September 2, 2024, it will take several more weeks for the Ministry to process the certificate of service transmit it through diplomatic channels and provide to Plaintiff;

WHEREAS the parties have not agreed to any prior extensions of time in this action; and

WHEREAS counsel for Plaintiff and Defendant have consented in writing to this extension;

IT IS STIPULATED AND AGREED THAT Defendant shall have up to and including October 14, 2024 to answer or otherwise respond to Plaintiff's Complaint. Nothing in this Stipulation shall be construed as a waiver of any of Plaintiff's or Defendants' rights, defenses, or arguments they would otherwise have.

Dated: September 25, 2024

**DOERR MACWILLIAMS HOWARD
PLLC**

/s/ Samuel L. Estenson
Samuel L. Estenson (P82414)
301 N. Main Street, Ste. 260
Ann Arbor, MI 48104
sam@dmhlawyers.com
(734) 926-2111

/s/ Derek T. Howard
Derek T. Howard (P69625)
838 West Long Lake Road, Suite 211
Bloomfield Hills, MI 48302
derek@dmhlawyers.com
(248) 432-1586

Dated: September 25, 2024

FLORENCE ROSTAMI LAW, LLC

/s/ Florence Rostami (w/ *permission*)

420 Lexington Avenue, Suite 1402

New York, New York 10170

frostami@rostamilaw.com

(212) 209-3962

(212) 257-6441 – Fax

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

FLORENCE ROSTAMI LAW LLC,

Case No. 2:24-cv-11123

Plaintiff,

v.

Honorable Brandy R. McMillion
Mag. Judge Anthony P. Patti

MITSUIYA INDUSTRIES, CO. LTD.

Defendant.

ORDER EXTENDING TIME TO RESPOND TO COMPLAINT

This matter coming before the Court upon the stipulation of the parties to extend the time for which Defendant Mitsuiya Industries, Co. Ltd. shall answer or otherwise plead, and the Court being fully advised in the premises;

IT IS HEREBY ORDERED that Defendant shall respond to Plaintiff's Complaint on or before October 14, 2024.

IT IS SO ORDERED.

Date: September 26, 2024

s/Brandy R. McMillion
Brandy R. McMillion
United States District Judge